

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**JONATHAN VILLARREAL,
Individually and derivatively on behalf
Of ZROBLACK, LLC**

Plaintiffs,

v.

JOHN SAENZ, et al.,

Defendants.

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No. 5:20-cv-00571-OLG

UNOPPOSED MOTION TO EXCEED PAGE LIMITS

**TO THE HONORABLE RICHARD FARRER,
UNITED STATES MAGISTRATE JUDGE:**

COME NOW Defendants MIGUEL VILLARREAL, JR., and GUNN, LEE, & CAVE, P.C. and move this Court for entry of an order authorizing the Parties (as defined herein) to file motions, responses, and replies pursuant to Federal Rule of Civil Procedure 12 that exceed the page limits established under Local Rule CV-7. Plaintiffs JONATHAN VILLARREAL, individually and derivatively on behalf of ZROBLACK, LLC and Defendants JOHN SAENZ, MIGUEL VILLARREAL, JR., and GUNN, LEE, & CAVE, P.C. (collectively, the “Parties”) have reached an agreement related to the extension of page limits for motions to dismiss the Plaintiffs’ First Amended Verified Complaint, as well as the responses and replies thereto.

1. The Plaintiffs filed a First Amended Verified Complaint [Dkt. 35] that contains 322 paragraphs and is 56 pages long. It asserts 11 causes of action and, in addition to monetary relief, requests multiple forms of declaratory, equitable, or injunctive relief.

2. The Defendants will be filing responsive motions pursuant to Federal Rule of Civil Procedure 12. Local Rule CV-7(d)-(f) mandates that such motions are limited to 20 pages, responses thereto are limited to 20 pages, and replies are limited to 10 pages.

3. Given the length and scope of the First Amended Verified Complaint, the Parties respectfully request that the page limits for the motions, responses, and replies be extended as follows:

- a. The Motions shall not exceed 30 pages.
- b. The Responses shall not exceed 30 pages.
- c. The Replies shall not exceed 15 pages.

4. Counsel has conferred regarding the requested relief via email. All Parties are in agreement with the extensions of page limitations set forth above.

WHEREFORE, PREMISES CONSIDERED, the Parties pray that the Court enter an order substantially in the form attached hereto as **Exhibit A** permitting the Parties to exceed the page limits set forth in Local Rule CV-7, and for such other relief to which they may be entitled at law or equity.

Dated January 22, 2021.

Respectfully submitted,

/s/ Natalie F. Wilson

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COUNSEL TO MIGUEL VILLARREAL, JR., and
GUNN, LEE & CAVE, PC

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, a true and correct copy of the above and foregoing instrument was served via the Court's electronic transmission on:

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/s/ Natalie F. Wilson
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